

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
: **Case No.: 18-16902**  
**Rahsaan G Thomas** : **Chapter 13**  
: **Judge Eric L. Frank**  
**Debtor(s)** : \* \* \* \* \*  
:  
**Wells Fargo Bank, N.A** : **Related Document # 49**  
**Movant,** :  
**vs** :  
:  
**Rahsaan G Thomas** :  
**Sade Thomas** :  
:  
**William C. Miller, Trustee** :  
**Respondents.**

**PRAECIPE OF WITHDRAWAL OF NOTICE OF FORBEARANCE PLAN**  
**(DOCKET NO. 49)**

Now comes Wells Fargo Bank, N.A ("Creditor") by and through counsel, and hereby  
withdraws its Notice of Forbearance Plan which was filed in this Court on May 15, 2020.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Karina  
Velter.

Contact email is kvelter@manleydeas.com

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<b>In re:</b>	:	
	:	<b>Case No.: 18-16902</b>
<b>Rahsaan G Thomas</b>	:	<b>Chapter 13</b>
	:	<b>Judge Eric L. Frank</b>
	:	<b>Debtor(s) : * * * * *</b>
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<b>Wells Fargo Bank, N.A</b>	:	<b>Related Document # 49</b>
	:	
<b>vs</b>	:	
	:	
<b>Rahsaan G Thomas</b>	:	
<b>Sade Thomas</b>	:	
	:	
<b>William C. Miller, Trustee</b>	:	
<b>Respondents.</b>		

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Praecipe of Withdrawal of Notice of Forbearance Plan (Docket No. 49) was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)[@usdoj.gov](mailto:usdoj.gov)

William C. Miller, Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105,  
[ecfemails@ph13trustee.com](mailto:ecfemails@ph13trustee.com)

David M. Offen, Attorney for Rahsaan G Thomas, The Curtis Center, 601 Walnut Street,  
Suite 160 West, Philadelphia, PA 19106, [dmo160west@gmail.com](mailto:dmo160west@gmail.com)

The below listed parties were served via regular U.S. Mail, postage prepaid, on August 20, 2020:

Rahsaan G Thomas, 37 W. Wyneva Street, Philadelphia, PA 19144

Rahsaan G Thomas and Sade Thomas, 37 West Wyneva Street, Philadelphia, PA 19144

DATE: August 20, 2020

/s/ Karina Velter

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